

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

REMARKS

Applicant concurrently files herewith a petition and fee for a one (1) month extension of time.

Claims 1-15 are all the claims presently pending in the application. Claims 1, 2, 5, 8 and 11 have been amended to more particularly define the invention.

It is noted that the claim amendments herein or later are not made to distinguish the invention over the prior art or narrow the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein or later should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1-7 and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ogushi et al. (U.S. Patent No. 6,385,497) in view of Bown et al. (U.S. Patent No. 4,414,621). Claim 8-12, 14 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ogushi et al. in view of Bown et al., and further in view of Crater et al. (U.S. Patent No. 5,805,442).

These rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

An exemplary aspect of the invention, as recited in claim 1, is directed to a remote control system for one or more semiconductor manufacturing apparatuses including a supervisory device which controls the one or more semiconductor manufacturing apparatuses, and a remote operation device that accesses the supervisory device through a communication

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

line, wherein upon accessing said supervisory device, wherein the remote operation device replaces operation parameter files of the supervisory device through remote control.

Another aspect of the present invention, as recited in claim 5, is directed to a remote control system for one or more semiconductor manufacturing apparatuses including a host operably connected to the at least one manufacturing apparatus, and a remote operation device including a communication element that accesses the host device by way of a communication line, wherein the host device is provided with an IP routing function for achieving remote control operation from the remote operation device, and a communication element having a call incoming function for receiving a call incoming from the communication line, and the host device performs user authentication when the remote operation device connects to the host device, wherein the remote operation device replaces operation parameter files of the host device through remote control.

Yet another aspect of the invention, as recited in claim 8, is directed to a remote control system for one or more semiconductor manufacturing apparatuses including a local area network system including a plurality of host devices each connected with one or more semiconductor manufacturing apparatuses, and a router connected with the host devices, and a remote operation device including a router that accesses the host devices by way of a communication line, wherein the host devices are each provided with an IP routing function for achieving remote control operation from the remote operation device, and a communication element having a call incoming function for receiving a call incoming from the communication line, and the host devices each perform user authentication when the remote operation device connects to the host devices, wherein the remote operation device

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

thus authenticated replaces operation parameter files of the host devices through remote control.

A further aspect of the present invention, as recited in claim 11, is directed to a remote control system for one or more semiconductor manufacturing apparatuses including a local area network system including a plurality of host devices each connected with at least one semiconductor manufacturing apparatus, and an access server connected with the host devices, and a plurality of remote operation devices each having a communication element capable of accessing the host devices by way of a communication network, wherein the host devices are each provided with an IP routing function for achieving remote control operation from each of the remote operation devices, and the host devices each serve to perform user authentication when each of the remote operation devices connects to the host devices, wherein each of said remote operation devices thus authenticated replaces operation parameter files of each of said host devices through remote control.

A remote control system for one or more semiconductor manufacturing apparatuses including such features in not taught or suggested by the cited references.

II. THE PRIOR ART REJECTION

A. The Ogushi et al. Reference

Ogushi et al. discloses a remote maintenance system for maintaining an industrial equipment installed at a remote location. (See Ogushi et al. at column 1, lines 5-7)

However, Ogushi et al. does not teach or suggest that “*the remote operation device replaces operation parameter files of the supervisory device through remote control,*” as

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

recited in independent claim 1. Independent claims 5, 8 and 11 contain similar language.

Therefore, Applicant submits that Ogushi et al. does not teach or suggest each and every element of the claimed invention.

B. The Bown et al. Reference

The Examiner alleges that Ogushi et al. would have been combined with Bown et al. to form the invention of claims 1-7 and 13. However, Applicant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Bown et al. discloses an interactive visual communications system consisting of a number of similar terminals linked together by narrow band communications links. (See Bown et al. at Abstract)

Applicant respectfully submits that these references would not have been combined as alleged by the Examiner. Indeed, no person of ordinary skill in the art would have considered combining these references, absent impermissible hindsight.

In fact, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the Examiner's allegations, none of these references teaches or suggests their combination.

Therefore, Applicant respectfully submits that one of ordinary skill in the art would not have been so motivated to combine the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

The Examiner concedes that Ogushi et al. fails to disclose or suggest that the remote

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

operation device displays the same screen simultaneously as that displayed in the supervisory (or host) device. Rather, the Examiner attempts to rely on Bown et al. to make up for the deficiencies of Ogushi et al.

However, Bown et al. fails to make up for the deficiencies of Ogushi et al. described above directed toward "*the remote operation device replaces operation parameter files of the supervisory device through remote control,*" as recited in independent claim 1. Independent claims 5, 8 and 11 contain similar language.

Indeed, Bown et al. actually makes no reference or suggestion of the remote operation device replacing operation parameter files of the supervisory or host devices through remote control. In fact, neither Ogushi et al, nor Bown et al., nor any combination thereof teaches or suggests such a feature.

Therefore, even assuming arguendo that Bown et al. may disclose simultaneous display on two screen, as alleged by the Examiner, there is no teaching or suggestion in Bown et al. of the remote operation device replacing operation parameter files of the supervisory or host devices through remote control, as in the claimed invention. Therefore, Bown et al. clearly does not make up for the deficiencies of Ogushi et al.

In light of the above, Applicant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

C. The Crater et al. Reference

The Examiner alleges that Ogushi et al. would have been combined with Bown et al.

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

and Crater et al. to form the invention of claims 8-12, 14 and 15. However, Applicant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention.

Crater et al. discloses an integrated control system comprising one or more controllers each equipped to perform a control function and to gather data (ordinarily from sensors) relevant to the control function. (Crater et al. at Abstract)

Applicant respectfully submits that these references would not have been combined as alleged by the Examiner. Indeed, no person of ordinary skill in the art would have considered combining these references, absent impermissible hindsight.

In fact, Applicant submits that the Examiner can point to no motivation or suggestion in the references to urge the combination as alleged by the Examiner. Indeed, contrary to the Examiner's allegations, none of these references teach or suggest their combination.

Therefore, Applicant respectfully submits that one of ordinary skill in the art would not have been so motivated to combine the references as alleged by the Examiner. Therefore, the Examiner has failed to make a prima facie case of obviousness.

The Examiner concedes that Ogushi et al. fails to disclose that the remote operation device displays the same screen as that displayed in the supervisory (or host) device, and further fails to disclose the use of a router as a communication element. Rather, the Examiner attempts to rely on Brown et al. and Crater et al. to make up for the deficiencies of Ogushi et al.

However, Crater et al. fails to make up for the deficiencies of Ogushi et al. described above directed toward "*the remote operation device replaces operation parameter files of the*

Serial No.: 09/901,577
Docket No.: KOKUSA1069
ORI.038

supervisory device through remote control,” as recited in independent claim 1. Independent claims 5, 8 and 11 contain similar language.

Indeed, Crater et al. actually makes no reference or suggestion of the remote operation device replacing operation parameter files of the supervisory or host devices through remote control. In fact, neither Ogushi et al, nor Bown et al., nor Crater et al., nor any combination thereof teaches or suggests such a feature.

Therefore, even assuming arguendo that Crater et al. may disclose a plurality of communication networks and elements to connect devices, as alleged by the Examiner, there is no teaching or suggestion in Crater et al. of the remote operation device replacing operation parameter files of the supervisory or host devices through remote control, as in the claimed invention. Therefore, Crater et al. clearly does not make up for the deficiencies of Ogushi et al. and Bown et al.

In light of the above, Applicant submits that these references would not have been combined and even if combined, the combination would not teach or suggest each and every element of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

IV. CONCLUSION

In view of the foregoing, Applicant submits that claims 1-15, all the claims presently pending in the application, are patentably distinct over the prior art of record and are allowable, and that the application is in condition for allowance. Such action would be appreciated.

Serial No.: 09/901,577
Docket No.: KOKUSAI069
ORI.038

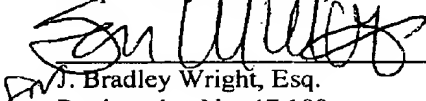
Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned attorney at the local telephone number listed below to discuss any other changes deemed necessary for allowance in a telephonic or personal interview.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR §1.136. The Commissioner is authorized to charge any deficiency in fees, including extension of time fees, or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Date:

11/25/05

Respectfully Submitted,

 34,386
J. Bradley Wright, Esq.
Registration No. 47,188

Sean M. McGinn, Esq.
Registration No. 34,386

McGINN INTELLECTUAL PROPERTY

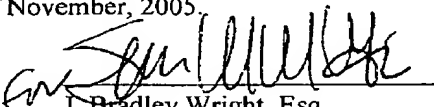
LAW GROUP, PLLC
8321 Old Courthouse Road, Suite 200
Vienna, VA 22182-3817
(703) 761-4100
Customer No. 21254

CERTIFICATION OF FACSIMILE TRANSMISSION

I hereby certify that the foregoing Amendment was filed by facsimile with the United States Patent and Trademark Office, Examiner Daniel M Unger, Group Art Unit #2132 at fax number (571) 273-8300 this 25th day of November, 2005.

Date:

11/25/05

 34,386
J. Bradley Wright, Esq.
Registration No. 47,188